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FOUNDED 1866

November 17, 2014

By Electronic Filing

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Hugh W. Bobbitt, Jr. and Georgetown Equity Advisors, Ltd. v. The Estate of
Stafford Obrutse, Imoniyame Holdings, Ltd., et al., Case No. 14 Civ. 8989 (AT)

Dear Judge Torres:

We write on behalf of Respondents International Chamber of Commerce and the Arbitral Tribunal of International Court of Arbitration Case # 19133/AGF, J. Brian Casey, Chair (collectively, the "ICC Respondents") in the above-referenced matter to request an extension of the deadline for the ICC Respondents to answer, move or otherwise respond to the Petition to Compel Arbitration and for Injunctive Relief (the "Petition").

Petitioners Hugh W. Bobbitt Jr. and Georgetown Equity Advisors, Ltd. ("Petitioners") filed the Petition in the Supreme Court of the State of New York, New York County, Index No. 652239/2014 (the "Proceeding") on or about July 3, 2014. On November 12, 2014, the ICC Respondents removed the Proceeding to this Court, pursuant to 9 U.S.C. §§ 202 and 205 and 28 U.S.C. § 1446.

Rule 81(c) of the Federal Rules of Civil Procedure provides that the deadline for the ICC Respondents to answer, move, or otherwise respond to the Petition is November 19, 2014. The ICC Respondents require additional time to answer, move or otherwise respond to the Petition, since they intend to file a motion to dismiss and in order to do so, they must satisfy Your Honor's individual rules relating to motions to dismiss and pre-motion conferences. In accordance with Your Honor's individual rules, on November 14, 2014, we transmitted a letter to Petitioners' counsel informing him of our intention to file a motion to dismiss and the grounds upon which we intend to do so.

Based on the foregoing, the ICC Respondents respectfully request that the deadline to answer, move, or otherwise respond to the Petition be extended by thirty days, to **December 19, 2014**.



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The ICC Respondents have made no previous request for an adjournment or extension. We have had email communications with Petitioners' counsel regarding this matter, and he has consented to our requested 30-day extension of time.

Respectfully,

A handwritten signature in black ink, appearing to read "L. Kimmelman", written over a horizontal line.

Louis B. Kimmelman

cc: Norman Solovay, Esq. (by email)
Counsel for Petitioners